

Carol Westlake
Executive Director
Tennessee Disability Coalition
VoIP Forum, April 30, 2004

Summary of Remarks

- I. **VoIP is very important to people with disabilities as a part of the consumer community.**
 - It is estimated that there are approximately 1 million people with disabilities in Tennessee. There is a wide range of type and severity in disability, and the impact of those disabilities varies, however, all of these people may be potential customers for VoIP.
 - In information services and telecommunications, access for persons with visual impairments, speech impairments, and hearing impairments can be especially challenging.
- II. **The design and implementation of VoIP technology can be either a boon or bane for those with disabilities.**
 - Access to new technologies can minimize the impact and effects of disability. For example, the Internet has created new independence and opportunity. Email, chat rooms, forums, shopping, all can be done from your home, even if a disability confines you there.
 - New technologies, if not carefully designed, can also create new problems for persons with disabilities. People with disabilities face barriers in communications, telecommunications, and information services, just like physical/environmental barriers such as stairs and curbs. For example, the graphical interface on the world wide web is not usable to persons who are blind or have limited vision.
 - From a development perspective, it is easier to design new technologies to be barrier free rather than to have to try to remove barriers or create alternatives later. Building in disability access from the beginning is critical
- III. **How VoIP is regulated may have a significant impact on people with disabilities.**
 - Telecommunications policy has traditionally required that all providers of voice telephony meet certain social obligations and public interest goals, many of which have direct impact on people with disabilities. Regulatory policy must continue to require all providers of voice services, regardless of the technology used, to meet those goals.
 - In addition to basic access, equality, and barrier free services for people with disabilities, universal service, disability access, public safety, and consumer protection are also critical.

IV. Specific recommendations and protections for those with disabilities

- VoIP technology needs to be subject to the obligations of Section 255 of the telecommunications Act of 1996 that requires "providers of telecommunications service" to ensure that the service is accessible to individuals with disabilities, if readily achievable. This language, which is similar to that of the Americans with Disabilities Act, provides instruction and protection.
- VoIP services need to be integrated into the Telecommunications Relay Services (TRS). All common carriers are required to provide these services by Title IV of the Americans with Disabilities Act. Relay services are intended to facilitate telephone communications by people who are deaf, hard of hearing or have speech disabilities in a manner that is functionally equivalent to conventional voice telephone services. This is a critical service and an important network.
- VoIP services should contribute to the Universal Service fund, which provides access to telephone service to residents in rural or high cost areas and low income people.
- VoIP services must provide E911 to customers.

VoIP is an exciting technology that offers opportunity, access, and cost savings to consumers, however, we call upon providers, the TRA, and other policymakers to work to ensure that all Tennesseans reap the benefits of these new technologies by protecting the programs that ensure universal service, access for people with disabilities, public safety, and other consumer protections.